

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Louise Legare GARDNER

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

State of South Carolina;
CHad W Burgess, Esq.; Benjamin CPSapp;
HHM Consulting Services (NEWBIZ); I use the
Bank National Trust Company.

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. 9:22-cv-01385-DCN-MGB

(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☐ No
(check one)

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I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name
Street Address
City and County
State and Zip Code
Telephone Number

Louise Regan GARNER
110 Post Office Box 3443
Durham SC 29910
843 683 2566

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number

State of South Carolina
C/O Attorney General Alan Wilson
1000 Assembly Street RM 519
Columbia SC 29201
29201
803-

Defendant No. 2

Name
Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number

Benjamin CP SAPP S. Referee
1255. Jefferies Blvd
Box 258
Walterboro SC
29488 - 0003
803

Defendant No. 3

Name

Chad W Burgess Attorney
c/o Brock and Scott PLLC.
2 West Park Center
3800 Forwarding Rd Suite 110
Columbia SC 29210

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name LOUISE Legare Cardin
 Street Address Post Office Box 344
 City and County Bluffton
 State and Zip Code South Carolina [29910]
 Telephone Number 843 683 2566

The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

④ Defendant No. 1 ✓

Name Deutsche Bank National Trust comp.
 Job or Title Trustee of INVESTORS INVESTMENTS as Trustee
 (if known)
 Street Address 1761 EAST SAN ANDREW Place
 City and County SANTA ANA
 State and Zip Code California 92705-4934
 Telephone Number _____

⑤ Defendant No. 2

Name PHH Mortgage Services (New Rep)
 Job or Title Services
 (if known)
 Street Address 1 Mortgage Way
 City and County Mount Laurel
 State and Zip Code NJ 08054
 Telephone Number _____

Defendant No. 3

Name _____

Job or Title (if known) Attorney for Debt Collector
 Street Address West Park Center 3800 Fernside Rd
 City and County Columbia State 110
 State and Zip Code SC 29210
 Telephone Number 803-434 3540
 Defendant No. 4
 Name PTH Mortgage Services (NewRez)
 Job or Title (if known) Services
 Street Address 1 Mortgage Way
 City and County Mount Laurel NJ 08054
 State and Zip Code NJ 08054
 Telephone Number 800 449 5767

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

VIOLATION OF STATUTES REGARDING FORECLOSURES /
DUE PROCESS / CIVIL RIGHTS / REAL ESTATE FRAUD /
BREACH OF CONTRACT / OBSTRUCTION OF THE
ADMINISTRATION OF JUSTICE / VIOLATIONS OF THE
CONSTITUTION

B. If the Basis for Jurisdiction Is Diversity of Citizenship**3.****The Plaintiff(s)****18****a. If the plaintiff is an individual**

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) Deutsche Bank National Trust, is incorporated comp. as Trustee under the laws of the State of (name) California, and has its principal place of business in the State of (name) CALIFORNIA May Be Registered in EC with The Secretary of state.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

48**The Defendant(s)****a. If the defendant is an individual**

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) PIH MORTGAGE SERVICES, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) NEW JERSEY, and has its principal place of business in (name) NEW JERSEY.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

Loiselogan Anderson
The plaintiff, (name) IS ANATONAL ^{He} State of SC, is a citizen of
the State of (name) SOUTH CAROLINA (unincorporated)
Republic State

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name)
_____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Benjamin SAPP, is a citizen of
the State of (name) SOUTH CAROLINA. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Benjamin SAPP Law Offices, is
incorporated under the laws of the State of (name)
SOUTH CAROLINA, and has its principal place of
business in the State of (name) LAW OFFICES OF Benjamin SAPP
incorporated under the laws of (foreign nation) AND Special Referee
SOUTH CAROLINA, and has its principal place of
business in (name) WALTERBORO SC.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

③ Defendant - chad w Burgess Attorney for
3800 51 Fernadiah way BROCK & SCOTT PLLC
Suite 110
COLUMBIA SC 29210

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

3.5 Million Combined From
all Defendants as The court
See FIT — For Multiple Human Rights
Violations
and abuse of Power.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Violation of My Rights / Fraud upon The court an on The court /
Deprived From Defending myself Banned From Jasper County
Filing / Abuse From Referee and clerk in Jasper County /
Forgery / Lack of Due Process / Real Estate Fraud /
Breach of contract / Obstruction of The administration
of Justice. (Statute Fraud)

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I ASK THE court to carefully Examine
Plaintiff Pleading fact and Restore
our Republic and STOP The abuse
against The people.
The facts AND the proof is all around us.
Please Read Carefully its all proven facts.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

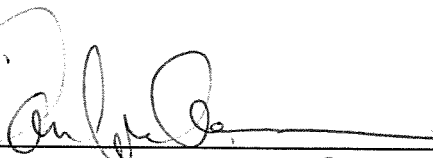
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 28 May, 2022.

Signature of Plaintiff

Printed Name of Plaintiff


Louise Legendre

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address

